

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CRIMINAL ACTION NOS. 04-30032-MAP
04-30032-MAP-1

UNITED STATES OF AMERICA,)
Plaintiff)
vs.)
FRANCIS G. KEOUGH, III)
Defendant)

DEFENDANT'S MOTION TO EXTEND TIME TO RESPOND TO THE GOVERNMENT'S
MOTION FOR A PRELIMINARY ORDER OF FORFEITURE

NOW HERE COMES the defendant, Francis Keough, and respectfully requests this Honorable Court to extend the time deadline for his response to the Government's motion for a Preliminary Order of Forfeiture from July 26, 2007 until August 2, 2007. As grounds therefore, and in support thereof, counsel for the defendant states that he has been on previously scheduled family vacation from July 13, 2007 until July 22, 2007, and has been unable to devote time and preparation to the response to the Government's Motion; that the defendant has only recently arrived at his designated prison facility in Pennsylvania, and counsel has not been able to arrange to communicate with the defendant regarding this issue. Undersigned counsel states that the delay of one week in its response will not unduly prejudice either side in this matter.

Furthermore, the Government has assented to this one week extension to file our response. Wherefore, the defendant respectfully requests that this motion be allowed for the above reasons.

THE DEFENDANT
FRANCIS KEOUGH

By /s/ Daniel D. Kelly

Daniel D. Kelly, Esq.,
101 State Street Suite 715
Springfield, MA, 01103
Phone (413) 733-0770
Fax (413) 733-1245
BBO No.: 634648

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 23, 2007.

/s/ Daniel D. Kelly

Daniel D. Kelly